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**DUE
DATE**

ACTION

States Government

Department of Energy
Rocky Flats Field Office

Memorandum

SEP 30 1994

SPA:EDR:10169

Level 1 Environmental Evaluation Audit Report Response (94-RF-08983)

S. G. Stiger, Manager
Environmental Restoration Management Division
EG&G Rocky Flats, Inc.

EG&G's response contained in 94-RF-08983, dated September 9, 1994 to the subject audit report concerning the EG&G Environmental Evaluation Issues I.1, I.2, and I.3, has been reviewed and the following determination has been made.

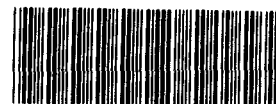
 Response is acceptable.

____ Response is acceptable with the following conditions (See Comments).

X Response is not acceptable (See Comments).

Contact Ed Ater at extension 7169 or Elver Robbins at extension 2043 if you have any questions.

Dero W. Sargent
Dero W. Sargent, Director
Standards, Performance, and Assurance



000043090

Attachment

cc w/Att:
M. Silverman, OOM, RFFO
S. Olinger, AMESH, RFFO
J. Roberson, AMER, RFFO
A. Burlingame, EG&G, RF
Division File 5730.42

CORRES. CONTROL	X	X
ADMN RECORD/080	X	2
PATS/T130G		



Reviewed for Addressee
Corres. Control RFP

10-3-94 JAB
DATE BY

Ref Ltr. #

DOE ORDER # 5700.6

ADMIN RECCRD
SW-A-003946

ATTACHMENT

RFFO/SPA COMMENTS ON EG&G's ENVIRONMENTAL EVALUATION (EE) AUDIT RESPONSE

EG&G's EE Audit Response to the Issues identified in the Level 1 Evaluation conducted by a team from the RFFO are unacceptable for the following reasons:

- A. Based on a review of the response and the discussions with EG&G personnel, RFFO's minimum expectations regarding integration of the response have not been met.
- B. EG&G's response to Issues I.1, I.2, and I.3 is inadequate and incomplete. The Audit raised the question of the credibility of specific ecological data and accompanying practices because it signifies a general QA problem in the IAG process. The audit results, coupled with subcontractor reviews such as that of OU 1 Phase III RI/RFI and EG&G's self evaluation, are symptomatic of a general deficiency in QA implementation in the RFETS's IAG programs. The need for defensibility of the IAG data (i.e., record making and record generation activities) and the data bases is paramount and critical to the success of the RFETS. The credibility of the data, data collection practices, and the implementation of an effective QA system remains a critical concern after having read the EG&G response.
- C. Failure to exercise the process for addressing corrective actions as specified in DOE/RFFO's RFI 5700.6, Quality Assurance, Section 10.d(6), Nonconformance and Corrective Action, and RFI 5700.6-05, Issues Management, Section b. Specifically, DOE expects EG&G to resubmit a complete and adequate response for the Issues identified in the subject audit. EG&G requested an additional 15 working days to prepare the initial response, and the RFFO agreed based on the expectation that the response would be complete and comprehensive. This expectation was not met.
- D. The following concerns have been identified as critical paths for the ERPD and are limiting EG&G's success at RFETS:
 - Failure to recognize the QA process as a planning and assessment tool for program control and subcontractor management,
 - EG&G's limited application of the QA program by not requiring a hierarchical QA process appropriate to each RFETS's MCS WBS levels, and
 - Regulatory guidance inadequacies in addressing field sampling QA, ecological data, and data synthesis/analysis.

The continued lack of planning, development, and implementation of adequate Data Quality Objectives throughout is underscored.

TABLE I

DATE	CORRECTIVE ACTION IMPLEMENTED	RESPONSIBLE GROUP
2/94	Started revising draft Standard Operating Procedures (SOPs) based on known problems within the EE program, including: 1) authentication blocks to the data forms, 2) explicit instructions on records turnover requirements, and 3) better definition of quality records. 12 of 14 draft SOPs are complete. (Attachment 2)	Ecology and Watershed Management
3/22/94	Performed comprehensive self-evaluation of EE data (all OUs) and reported conclusions to upper level management. (Attachment 3)	Ecology and Watershed Management
5/18/94	Produced and distributed a generic data form to document and ensure quality checks of ALL ecologic data forms completed in the field, both on hard copy and uploaded digital data. The data form contents will be formally incorporated into ongoing revisions of EE standard operating procedures. (Attachment 4) Data form was presented to DOE, RFFO in roundtable discussions and found in OU 11 fieldwork Spring '94, and was favorably reviewed by the DOE, RFFO audit team.	Ecology and Watershed Management
6/94	Dedicated Quality Coordinators to specific OUs to address quality issues at the project level.	Environmental Restoration Program Division
6/29/94	Accomplished comprehensive data reviews and quantitative summaries of deficiencies for EE data from OUs 5 and 6; records are in the process of correction and completion before turnover to the ERPD Records Center. (Attachment 5)	Ecology and Watershed Management Environmental Restoration Program Division
8/94	Budgeted for implementation of a sitewide ecological database in the FY 95 work package, to include all existing and future EE data. (Attachment 6) The database is accessible by RFEDS and directed by the M&O ecology staff.	Environmental Restoration Program Division Ecology and Watershed Management
9/1/94	Accomplished comprehensive data reviews and quantitative summaries of deficiencies for EE data from OU 1; records are in the process of correction and completion before turnover to the ERPD Records Center. (Attachment 7)	Ecology and Watershed Management Environmental Restoration Program Division

ET 2/3